

The Hon. John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
KENNETH JOHN RHULE, and  
KENNETH WARREN RHULE,  
Defendants.

No. CR20-105-JCC

**SUPPLEMENTAL DECLARATION  
OF AUSA KRISTA K. BUSH  
IN SUPPORT OF A  
FINAL ORDER OF FORFEITURE**

I, KRISTA K. BUSH, declare and say:

1. I am a duly appointed Assistant United States Attorney (“AUSA”) for the Western District of Washington. I am assigned to the above-captioned case, along with AUSAs Casey Conzatti and Philip Kopczynski. I respectfully submit this supplemental declaration to provide the Court with new information I received today about one of the letters sent to an address associated with potential claimant O.R., also known as O.G.

2. As noted in my initial declaration, Dkt. No. 158, the United States sent notice on January 24, 2023 to six addresses associated with potential claimant O.R. Three notices were returned as “not deliverable” and “unable to forward.” Notice to an address in Russia could not be delivered because mail service to that country has been suspended. The two notices that were delivered were addressed to potential claimant O.R. in care of

1 counsel for Defendant Kenneth John Rhule, Barry L. Flegenheimer and Peter  
2 Offenbecher. Those notices were delivered on January 26, 2023 and January 27, 2023.

3 3. On March 8, 2023, Mr. Offenbecher informed me that his office does not  
4 represent, is not in contact with, and does not accept service for potential claimant O.R.  
5 A true and correct copy of this letter, redacted to preserve the privacy of this potential  
6 claimant, is attached hereto as Exhibit A.

7 4. The United States has no other contact information for potential claimant  
8 O.R. and has exhausted all reasonable means of providing direct notice of the pending  
9 forfeiture to potential claimant O.R.

10 5. Revised proposed orders are provided with this supplemental declaration.

11  
12 I declare under penalty of perjury that the foregoing is true and correct.

13  
14 EXECUTED on this 8th day of March, 2023 at Seattle, Washington.

15  
16 s/ Krista K. Bush  
17 KRISTA K. BUSH  
18 Assistant United States Attorney  
19 United States Attorney's Office  
20 700 Stewart St., Suite 5220  
21 Seattle, WA 98101  
22 Phone: (206) 553-2242  
23 Fax: (206) 553-6934  
24 Krista.Bush@usdoj.gov  
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26  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 8, 2023, I electronically filed the foregoing Supplemental Declaration with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

s/ Krista K. Bush

KRISTA K. BUSH

Assistant United States Attorney

United States Attorney's Office

700 Stewart St., Suite 5220

Seattle, WA 98101

Phone: (206) 553-2242

Fax: (206) 553-6934

Krista.Bush@usdoj.gov